

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendments, claims 1, 3, 4, 7-11, 13, 14, and 16-20 are pending in the application, with claims 1, 11, and 20 being the independent claims. Claims 1, 3, 4, 10, 11, 13, 14, 19, and 20 are sought to be amended. Support for the amendment may be found, for example, in the previously presented claims, at pages 3, 4, and 6-8, in FIGS. 2 and 5, and throughout the originally filed application. Claims 2, 5, 12, and 15 are sought to be canceled without prejudice to or disclaimer of the subject matter therein. Applicants reserve the right to prosecute similar or broader claims, with respect to the cancelled and amended claims, in the future. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendments and the following remarks, Applicants respectfully request the Examiner to reconsider and withdraw all outstanding rejections.

Rejections under 35 U.S.C. § 102

A. Claims 1, 5, 7-11, and 15-20

Claims 1, 5, 7-11, and 15-20 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by any one of: Wong (U.S. Publication No. 2002/0108497), Sen (U.S. Patent No. 5,535,989), Arvanitakis (U.S. Patent No. 3,246,452), Van Duijn (U.S. Patent No. 6,325,361), Ferretti (U.S. Patent No. 3,266,224), Brown, Jr. et al. (U.S. Patent No. 4,497,641; hereinafter "Brown"), Clark (U.S. Patent No. 2,802,543), Marlowe (U.S. Patent No. 6,267,804), Sibley et al. (U.S. Patent No. 4,609,386; hereinafter "Sibley"), Foidl (U.S. Patent No. 4,588,535), or Lowery, Sr. (U.S. Patent No. 3,993,448). Without acquiescing to the propriety of the rejection, claims 5 and 15 are sought to be canceled, which renders the

rejection moot with respect to those claims. Applicants respectfully traverse the rejection, and Response to Arguments section, with respect to pending claims 1, 7-11, and 16-20.

1. The Applied References Do Not Anticipate At Least the Recited "an outer wall"

Applicants submit that the independent claims recite features that distinguish over the applied references. For example:

Claim 1 recites at least "a first deposition wall having a first surface, the surface being configured to receive a film of the cleaning liquid and being configured to be ***an outer wall of the cleaning device ...***."

Claim 11 recites at least "wherein at least one of the plurality of separate deposition walls is an inner surface of ***an outer wall of the system ...***."

Claim 20 recites at least "at least one first deposition wall having a first surface, the surface being configured to receive a film of cleaning liquid and being configured to be ***an outer wall of the cleaning device ...***."

Without acquiescing to the Examiner's statements regarding the applied references, even assuming the Examiner can show first and second walls in the references, Applicants submit that the applied references fail to teach or suggest, for example, at least the above-noted distinguishing features.

Regarding Wong, the Office Action states "first and second walls (16) positioned within the cleaning chamber," (Office Action, p. 2). However, the first and second walls (16) in Wong cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Sen, the Office Action states "first wall (7, 9, 10) and second wall (7, 9, 10) positioned within the cleaning chamber," (Office Action, p. 2). However, the first and

second walls (7, 9, 10) in Sen cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Arvanitakis, the Office Action states "first wall (106) and second wall (102) and so on positioned within the cleaning chamber," (Office Action, p. 2). However, the first and second walls (106, 102) in Arvanitakis cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Von Duijn, the Office Action states "first and second walls (5, 7) positioned within the cleaning chamber," (Office Action, p. 3). However, the first and second walls (5, 7) in Von Duijn cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Ferretti, the Office Action states "first and second walls (20, 22) positioned within the cleaning chamber," (Office Action, p. 3). However, the first and second walls (20, 22) of Ferretti cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Brown, the Office Action states "first and second walls (18, 20) positioned within the cleaning chamber," (Office Action, p. 3). However, the first and second walls (18, 20) in Brown cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Clark, the Office Action states "first and second walls (41, 39) positioned within the cleaning chamber," (Office Action, p. 3). However, the first and second walls (41, 39) of Clark cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Marlowe, the Office Action states "first and second walls (31, 33, 35) positioned within the cleaning chamber," (Office Action, p. 3). However, the first and second walls (31, 33, 35) in Marlowe cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Sibley, the Office Action states "first and second walls (20) positioned within the cleaning chamber," (Office Action, p. 3). However, the first and second walls (20) in Sibley cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Foidl, the Office Action states "first and second walls (21) positioned within the cleaning chamber," (Office Action, p. 4). However, the first and second walls (21) in Foidl cannot be used to teach the recited surface that is an outer wall of the device.

Regarding Lowery, Sr., the Office Action states "first and second walls (23, 24, 25) positioned within the cleaning chamber," (Office Action, p. 4). However, the first and second walls (23, 24, 25) in Lowery cannot be used to teach the recited surface that is an outer wall of the device.

Therefore, as each and every one of the alternative applied references fails to teach at least the above-noted distinguishing features of claims 1, 11, 20, the alternative applied references cannot be used to anticipate the claims.

2. The Applied References Do Not Anticipate At Least The Recited "first and second series-connected modules"

Furthermore, without acquiescing to the propriety of the rejection, independent claims 1, 11, and 20 were clarified to recite additional features that distinguish over the applied references. For example, claim 1 recites:

a cleaning chamber comprising first and second series-connected modules, configured to have different operative principles of deposition, which are connected one after the other in series,

...

wherein the second series-connected module comprises,
a bath comprising the cleaning liquid, and
a supply line coupled below a liquid level of the bath and configured to allow the contaminated process gas to flow therein and rise upwards in bubbles in the bath.

Similarly, claim 11 recites, for example:

a cleaning chamber comprising first and second series-connected modules, configured to have different operative principles of deposition, which are connected one after the other in series,

...

wherein the second series-connected module comprises,
a bath comprising the cleaning liquid, and
a supply line coupled below a liquid level of the bath and configured to allow the contaminated process gas to flow therein and rise upwards in bubbles in the bath.

Claim 20 recites, for example:

the cleaning chamber comprising first and second series-connected modules, configured to have different operative principles of deposition, which are connected one after the other in series,

...

wherein the second series-connected module comprises a bath comprising the cleaning liquid, and
wherein the supply line is coupled below a liquid level of the bath and is configured to allow the contaminated process gas to flow therein and rise upwards in bubbles in the bath.

Without acquiescing to the Examiner's statements regarding the applied references, Applicants submit that the applied references fail to teach or suggest, for example, at least the above-noted additional distinguishing features. For example, the independent claims 1, 11, and 20 were amended to incorporate distinguishing features recited in now canceled claims 2 and 12. The applied references noted above were not applied against the distinguishing features recited in claims 2 and 12. Thus, the Examiner has conceded the applied references do not teach or suggest at least these additional distinguishing features.

Accordingly, as the applied references fail to teach or suggest all the distinguishing features recited in independent claims 1, 11, and 20, the applied references cannot be used to anticipate claims 1, 11, and 20. Thus, Applicants submit that claims 1, 11, and 20 are patentable over the applied references.

Rejected pending claims 7-10 and 16-19 depend from independent claims 1 and 11, respectively. Thus, Applicants submit that dependent claims 7-10 and 16-19 are allowable

over the applied references at least because of their respective dependencies from claims 1 and 11, as well as because of their own distinguishing features.

Applicants request that the alternative rejections be reconsidered and withdrawn, and that claims 1, 7-11, and 16-20 be passed to allowance.

B. Claims 1-5 and 7-20

Claims 1-5 and 7-20 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Hongo *et al.* (U.S. Patent No. 4,775,499, hereinafter "Hongo"). Without acquiescing to the propriety of the rejection, claims 2, 5, 12, and 15 are sought to be canceled, which renders the rejection moot with respect to those claims. Applicants respectfully traverse the rejection with respect to pending claims 1, 3, 4, 7-11, 13, 14, and 16-20.

1. Hongo Fails to Anticipate At Least the Recited "an outer wall"

As discussed above, the independent claims recite features that distinguish over the applied reference. For example, claims 1, 11, and 20 recite the "*an outer wall*" feature shown and discussed above in Section A.1

Without acquiescing to the Examiner's statements regarding the applied reference, Applicants submit that Hongo fails to teach or suggest, for example, at least the above-noted distinguishing features. The Office Action states "first and second walls (4) positioned within the cleaning chamber," (Office Action, pp. 5-6). However, the first and second walls (4) of Hongo cannot be used to teach the recited surface that is an outer wall of the device.

2. Hongo Does Not Anticipate At Least The Recited “first and second series-connected modules”

Furthermore, without acquiescing to the propriety of the rejection, independent claims 1, 11, and 20 were clarified to recite additional features that distinguish over the applied reference. For example, claim 1 recites:

a cleaning chamber comprising first and second series-connected modules, configured to have different operative principles of deposition, which are connected one after the other in series,

...

wherein the second series-connected module comprises,
a bath comprising the cleaning liquid, and
a supply line coupled below a liquid level of the bath and configured to allow the contaminated process gas to flow therein and rise upwards in bubbles in the bath.

Similarly, claim 11 recites, for example:

a cleaning chamber comprising first and second series-connected modules, configured to have different operative principles of deposition, which are connected one after the other in series,

...

wherein the second series-connected module comprises,
a bath comprising the cleaning liquid, and
a supply line coupled below a liquid level of the bath and configured to allow the contaminated process gas to flow therein and rise upwards in bubbles in the bath.

Claim 20 recites, for example:

the cleaning chamber comprising first and second series-connected modules, configured to have different operative principles of deposition, which are connected one after the other in series,

...

wherein the second series-connected module comprises a bath comprising the cleaning liquid, and
wherein the supply line is coupled below a liquid level of the bath and is configured to allow the contaminated process gas to flow therein and rise upwards in bubbles in the bath.

Without acquiescing to the Examiner's statements regarding the applied reference, Applicants submit that Hongo fails to teach or suggest, for example, at least the above-noted additional distinguishing features. Hongo discloses a gas-liquid contacting apparatus.

However, Hongo fails to teach or suggest, for example, "a supply line coupled below a liquid level of the bath and configured to allow the contaminated process gas to flow therein and rise upwards in bubbles in the bath," as recited in claims 1, 11, and similarly in claim 20. Rather, in contrast to the recited additional distinguishing feature, Hongo discloses that "pump 6 is installed in relation to a channel 14 connecting the gas channel 2 with the liquid dosing device 5." (Hongo, col. 4, lines 2-4; FIGS. 1 and 2.) In other words, the liquid dosing device 5 draws *liquid* via channel 14. Hongo is silent as to supplying contaminated gas that rises upwards in bubbles of a bath.

Therefore, as Hongo fails to teach or suggest all the distinguishing features recited in independent claims 1, 11, and 20, Hongo cannot be used to anticipate claims 1, 11, and 20.

Accordingly, Applicants submit that claims 1, 11, and 20 are patentable over Hongo. Rejected pending claims 3, 4, 7-10, 13, 14, and 16-19 depend from independent claims 1 and 11, respectively. Thus, Applicants submit that dependent claims 3, 4, 7-10, 13, 14, and 16-19 are allowable over the applied reference at least because of their respective dependencies from claims 1 and 11, as well as because of their own distinguishing features.

Applicants request that the rejection be reconsidered and withdrawn, and that claims 1, 3, 4, 7-11, 13, 14, and 16-20 be passed to allowance.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that

personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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